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HRD06/1719L

November 22, 2006

Alan Goo
Director of Public Works
Department of the Army
Headquarters, U.S. Army Garrison, Hawaii
Schofield Barracks, HI 96857-5000

RE: Continuing Section 106 Consultation for the Qualifying Training Range 1 (QTR1) Project, Lihu'e (Schofield Barracks), O'ahu, TMK: 7-7-001

Dear Alan Goo,

The Office of Hawaiian Affairs (OHA) is in receipt of your November 1, 2006 request for comments on the above-referenced project. We offer the following comments.

We have several recommendations regarding this project. First, we recommend changing the language in the second paragraph, which states, "The QTR1 project area has been archaeologically inventoried and a significant site (TS210) was located within the range surface danger zone...." As you are aware, the burial site designated TS210 was not identified during archaeological inventory survey, but was missed. Rather, the site was found after the survey was completed, during monitoring activities. This is an important distinction that should be corrected in future correspondence regarding this project, because it goes to the issue of the adequacy of the original field assessments.

Second, according to your documents, although the line-of-fire has been changed so that it does not directly go over Site TS210, "...there is still the possibility that ricochets and other range debris may inadvertently land within the site area." Given the spiritual and religious significance of these burials, and given the fact that firing-range training is, by definition, bound to result in stray rounds, we do not favor any line-of-fire that threatens to harm TS210. We suggest this particular line-of-fire be abandoned or moved further away from the site.

Third, should you proceed using the current (redirected) line-of-fire, we recommend that you more precisely define the proposed "no fire zone." According to your documents, "[t]he vicinity

EXHIBIT "O"

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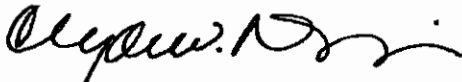
of the site would be designated on range maps as an area not to be targeted by direct and indirect weapons," but the size, extent, and overall shape of the buffer zone should be presented to consulting parties for review.

Finally, we note your mention of "...Native Hawaiians who have identified themselves as lineal descendants from the Schofield area." We recommend that, in future consultation regarding this project, you provide an update of NAGPRA compliance regarding genealogical recognition to Site TS210. It is unclear as to whether the Army has recognized any lineal descendants or whether these are simply "self-reported" data, which may carry little legal significance.

OHA further requests that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during ground disturbance associated with this project, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

Thank you for the opportunity to comment. If you have further questions, please contact Kai Markell, Lead Advocate – Culture, at (808) 594-1945 or kaim@oha.org.

Sincerely,



Clyde W. Nāmu'o
Administrator